

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

Medical Quant USA, Inc.,	)	CASE NO.: 1:21 cv 877
	)	
Plaintiff	)	JUDGE PATRICIA A. GAUGHAN
	)	
vs.	)	
	)	<b>MOTION OF PLAINTIFF MEDICAL</b>
Radiant Life Technologies Ltd.,	)	<b>QUANT USA, INC. TO ESTABLISH</b>
	)	<b>DEADLINE BY WHICH TO FILE</b>
Defendant	)	<b>MOTION FOR DEFAULT JUDGMENT</b>
	)	<b>AND MEMORANDUM IN SUPPORT</b>

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and the Court's inherent authority, Plaintiff Medical Quant USA, Inc. ("MQ") respectfully moves the Court to establish a date -- through and including August 6, 2021 -- by which MQ's Motion for Default Judgment against Defendant, Radiant Life Technologies Ltd. ("Motion for Default Judgment"), must be filed.

MQ has obtained a determination from the Clerk that Radiant Life Technologies is in default of answer. Now, MQ is preparing to file its Motion for Default Judgment. While MQ's Motion for Default Judgment is substantially complete, additional time is necessary to finalize and file it.

This Motion is asserted on the basis that a serious illness of a close family member of lead counsel for MQ, Stephen H. Jett, has required a significant time commitment by Mr. Jett -- particularly during the month of July, 2021. In addition, the required filing is extensive and has required more time than is normally required in connection with preparing a motion for default judgment, which has been complicated by the illness in Mr. Jett's family.

This Motion is more fully supported by the *Memorandum in Support* below.

Respectfully submitted,

/s/ Stephen H. Jett

Stephen H. Jett (0046821)

Matthew D. Smith (0099806)

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**MEMORANDUM IN SUPPORT**

As noted above, MQ's Motion for Default Judgment is substantially complete. However, for the following reasons, the establishment of a date certain -- through and including August 6, 2021 -- by which MQ must file its Motion for Default Judgment is necessary.

This Motion is supported by the existence of a serious illness of a close family member of lead counsel for MQ, Stephen H. Jett, which has required a significant time commitment by Mr. Jett -- particularly during the month of July, 2021. The extensive nature of the required filing -- which is more time consuming than usual for motions for default judgment -- also necessitates the relief requested herein, which has been complicated by the illness in Mr. Jett's family.

**CONCLUSION**

For the foregoing reasons, Plaintiff Medical Quant USA, Inc. respectfully requests that the Court establish a date certain -- through and including August 6, 2021 -- by which to file its Motion for Default Judgment.

Respectfully submitted,

/s/ Stephen H. Jett

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on this 30<sup>th</sup> the day of July, 2021. Notice of this filing was sent to Leslie Carmen and Svitlana Myronenko, agents of Radiant Life Technologies, LTD, via email, at Lesliecarmen@gmail.com and mirs77@gmail.com, respectively.

/s/ Stephen H. Jett

Stephen H. Jett (0046821)

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